

Anti-Modern Slavery and Human Trafficking

Code of Conduct Nuclear Transport Solutions



1. Introduction

- 1.1. This code of conduct serves as a set of internal guidelines for NTS employees to highlight the behaviours and actions that employees can take to ensure there is transparency in our own business and in our approach to tackling Modern Day Slavery.

2. What is Modern Slavery?

- 2.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.
- 2.2. NTS are committed to acting ethically and with integrity in all our business relationships and to implement controls to ensure Modern Slavery is not taking place anywhere in our own business or in any of our supply chains.

3. Guidance for NTS Employees

- 3.1. At NTS we should work together to promote the eradication of human rights violations by learning about them, carrying out due diligence with potential suppliers and by taking action to appropriately remedy any such violations.
- 3.2. Our primary concerns are the mistreatment of people which could include staff of a supplier or its sub-tier suppliers and the impact on our reputation.
- 3.3. Slavery can be easily hidden beneath tiers of supply and can take place anywhere, which is why it is important for an employee to be vigilant, looking for signs that slavery may be taking place in its supply chain. Some signs may be:
- Suppliers based in nations with poor scores in the Corruption Perceptions Index (CPI)
 - Suspiciously low labour costs
 - Variations in the quality of the purchased products (due to the labourers being unskilled)
 - Evidence that the workers live on site or are held against their will elsewhere
 - Unwillingness of workers to communicate or make eye contact when viewing shop floors
 - Poor quality workstations and workshops
 - Few labourers, but long shifts or round the clock working taking place
 - UK based suppliers who do not have a published anti-slavery statement

Remember to stay alert and look for evidence of the indicators listed above when interacting with suppliers or visiting a supplier's premises.

- 3.4. NTS employees with concerns should notify procurement if suspicious of human rights abuses so procurement can take the necessary steps and due diligence checks.

Employees may also consider:

- Checking code of conduct documentation provided by the supplier (usually on their website); do they explicitly reject slavery?
- Downloading the 'Unseen' mobile phone application on their phones.
- Contacting the Modern Slavery Helpline to get help, report a suspicion or seek for advice on 08000 121 700.
- or speak to procurement for further information.

M.Armstrong

Matt Armstrong

Head of Procurement and Supply Chain

for Nuclear Transport Solutions

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